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Chapter 7 Trustee
7

8 **UNITED STATES BANKRUPTCY COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION**
10

11 In re:

12 YAO LIN,

13 Debtor.
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Case No. 1:23-bk-10733-MB

Chapter 7

**REPLY TO DEBTOR YAO LIN'S
OPPOSITION TO MOTION OF CHAPTER
7 TRUSTEE AMY L. GOLDMAN FOR AN
ORDER (A) APPROVING SALE OF
ESTATE CLAIMS FREE AND CLEAR OF
ALL LIENS, CLAIMS, ENCUMBRANCES,
AND INTERESTS PURSUANT TO 11 U.S.C.
§ 363 (f), (B) GRANTING PROTECTION
TO BUYER AS A GOOD FAITH
PURCHASER PURSUANT TO 11 U.S.C. §
363(m), (C) WAIVING STAY UNDER
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 6004, AND (D) GRANTING
RELIEF FROM THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. § 362(d);
DECLARATION OF BRIAN M.
METCALF IN SUPPORT THEREOF**

Date: May 6, 2025

Time: 11:00 a.m.

Ctrm: 303

21041 Burbank Blvd.

Woodland Hills, CA 91367

Judge: Hon. Martin R. Barash

1 **I. INTRODUCTION**

2 The Debtor's¹ opposition to the Motion is meritless, should not have been filed or
3 maintained, and the Trustee should not have been forced to respond to it. In the first place, as this
4 Court has observed “under black-letter law in this Circuit [that has existed for] nearly 40 years” the
5 Debtor “lacks standing to challenge the Trustee’s administration of the estate unless [he] provides
6 admissible evidence that [he] has a pecuniary interest in the estate or in the specific asset or claim at
7 issue.” *In re Baroni*, 643 B.R. 253, 284-87 (Bankr. C.D. Cal. 2022). In this case, the Debtor has not
8 shown and cannot possibly show that he has any potential pecuniary interest in the Estate Claims.
9 That is because he is “hopelessly insolvent”, in part due to the comprehensive intentional and
10 constructive fraudulent transfers of assets to his wife/ex-wife/wife Chen, and claims to have no
11 meaningful financial resources while more than \$21 million in allowed claims have been filed
12 against the Estate.² *Id.* Thus, the Debtor plainly “lacks standing to challenge the Trustee’s
13 administration of the estate”, much less object to the sale of the Estate Claims and related relief, as a
14 matter of law. *Id.* The Debtor’s lack of standing to object to the relief sought by the Trustee is
15 dispositive and mandates denial of the opposition on that basis alone.

16 Even if that were not the case, the arguments the Debtor advances to obstruct the sale and
17 derail pursuit of the Estate Claims against Chen and affiliated entities are objectively preposterous,
18 not supported by *any* evidence, and have no good faith basis in fact or law. As an initial matter,
19 although the Debtor represents that other purported creditors will supposedly not benefit from the
20 transaction, he equally lacks standing to raise these third party objections and the hollow

21 _____
22 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in
23 the *Motion of Chapter 7 Trustee Amy L. Goldman for an Order (A) Approving Sale of Estate Claims*
24 *Free and Clear of All Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. § 363(f),*
25 *(B) Granting Protection to Buyer as a Good Faith Purchaser Pursuant to 11 U.S.C. § 363(m), (C)*
26 *Waiving Stay Under Federal Rule of Bankruptcy Procedure 6004, and (D) Granting Relief From the*
27 *Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Docket No. 61] (the “Motion”).

28 ² As explained in the Motion, only two proofs of claim were filed in the Case that may be
entitled to a distribution from the Estate. Although the Debtor references other dubious claims listed
in his schedules – including alleged debts of *more than \$45 million* owed to his own wife/ex-
wife/wife Chen – those creditors did not file proofs of claim and, thus, cannot have allowed claims
or receive any distributions from the Estate. *See* Fed. R. Bankr. P. 3002(a). Nevertheless, even if
the scheduled claims were considered, it would simply deepen the Debtor’s overwhelming
insolvency to more than \$91 million in aggregate liabilities. *See* Declaration of Brian M. Metcalf
(the “Metcalf Decl.”) at ¶ 4.

1 lamentations on their behalf are facially absurd, in particular because *none of them have objected to*
2 *the Motion*. Indeed, because the Debtor claims to have no assets and strives to discharge his
3 significant liabilities while paying creditors *nothing* in this Case, his complaint that the proceeds are
4 supposedly inadequate for third party creditors that never objected to the sale of the Estate Claims
5 (and are not entitled to receive distributions from the Estate) is not remotely credible.

6 Substantively, the Debtor's objections are based on a series of misrepresentations and
7 accusations that the Trustee seeks approval of the proposed sale of the Estate Claims "in order to
8 pay her own fees and expenses at the expense of the Estate" and it "likely will not accomplish more
9 for the creditors of the Estate than paying the administrative expenses and professional fees of the
10 Trustee." Opposition at 6-7. These claims are false, and the Debtor and counsel should not have
11 advanced them to the Court because they know or should have known their assertions have no basis
12 in fact or law. Again, only two proofs of claim were filed in the Case that may receive distributions
13 from the Estate, including by the Buyer. While the Buyer's allowed and undisputed claim against
14 the Estate exceeds \$21 million, the other allowed claim is approximately \$10,000. As part of the
15 transaction, the Buyer has agreed to subordinate its \$21 million claim to the only other allowed
16 claim, and the proceeds obtained from the Purchase Price will be used to pay that claim *in full* and
17 cover the administrative expenses and professional fees of the Estate. As a result, the only other
18 creditor with an allowed claim will receive a full recovery, funds will be made available for
19 administrative expenses and professional fees, the Estate will avoid the costs and risks of litigation,
20 and the Buyer can pursue the Estate Claims on its own behalf and at its own expense to recover on
21 its \$21 million allowed and undisputed claim.

22 **II. ARGUMENT**

23 **A. The Debtor Lacks Standing to Oppose the Sale of the Estate Claims**

24 The Trustee understands that the Court follows well-established law holding the Debtor
25 "lacks standing to challenge the Trustee's administration of the estate unless [he] provides
26 admissible evidence that [he] has a pecuniary interest in the estate or in the specific asset or claim at
27 issue." *Baroni*, 643 B.R. at 286. In particular, as the Court previously noted, "courts in the Ninth
28 Circuit have determined that, unless they demonstrate a pecuniary interest in the bankruptcy estate

1 or in the asset or debt at issue, chapter 7 debtors lack standing to . . . object to the sale of assets of
2 the estate.” *Id.* 643 B.R. at 285 (citing *In re Benham*, 678 Fed. Appx. 474, 475-76 (9th Cir. 2017).

3 Here, the Debtor has not even asserted he has a pecuniary interest in the Estate Claims that
4 could give him standing to object to the Motion. Nor has the Debtor provided admissible evidence
5 showing he has the required pecuniary interest to establish standing to object to the Trustee’s sale of
6 the Estate Claims or administration of the Estate. In fact, even though the Debtor was required to
7 present “declarations and copies of all evidence on which [he] intends to rely” and the “[f]actual
8 contentions involved in [his] . . . opposition. . . must be presented, heard, and determined upon
9 declarations and other written evidence,” he has submitted no evidence at all. LBR 9013-1(f)(2),
10 (i). Simply stated, the Debtor has not either argued or attempted to show that he has an economic
11 interest in the Estate Claims that grants him standing to object to the Motion in the first place.

12 While the Trustee is not obligated to establish that the Debtor lacks an economic interest in
13 the Estate Claims and has no standing to oppose the Motion, the available record still conclusively
14 demonstrates he is woefully insolvent and there is no realistic possibility the value of the Estate
15 Claims could ever result in a surplus for his benefit. Indeed, because the allowed claims against the
16 Estate are approximately \$21 million, the sales proceeds from the Estate Claims would have to
17 *exceed \$21 million* before the Debtor could even be eligible to receive any residual amount. To the
18 extent the liabilities from the Debtor’s schedules were considered, the net sales proceeds would
19 have to *exceed \$91 million*. See Metcalf Decl. at ¶ 4.

20 Nevertheless, the Debtor’s counsel has recently suggested they may raise the new claim that
21 “[i]f the transfers of the Malibu properties are avoided and brought into the estate, a surplus estate
22 could exist with a payout to Debtor, especially given that the judgment creditor’s claim is in
23 dispute.” The notion is farcical for multiple reasons. First, the Debtor did not assert he had any
24 potential economic interest in the Estate Claims in the opposition. Second, there is no evidence that
25 the value of the Estate Claims or “Malibu properties” exceed the \$21 million in allowed claims
26 against the Estate. Third, the Debtor’s own schedules indicate that he has over \$91 million in net
27 liabilities. Fourth, the Debtor’s schedules further indicate that he *does not dispute the Buyer’s*
28 *claim*. On the contrary, the Debtor scheduled a claim owed to the Buyer in the amount of

1 \$21,165,155.97 that is not contingent, unliquidated, or disputed, and stated under penalty of
2 perjury that the information was true and correct. *Id.* at ¶ 5, Ex. 1.

3 In short, the Debtor is “hopelessly insolvent,” has no possible pecuniary interest in the
4 Estate Claims, and fundamentally lacks standing to object to the Motion. *Baroni*, 643 B.R. at 285
5 (quoting *Fondiller v. Robertson (In re Fondiller)*, 707 F.2d 441, 443 (9th Cir. 1983)).

6 **B. The Debtor Misrepresents the Terms for the Proposed Sale of the Estate Claims**

7 The Debtor does not dispute that the Trustee has the duty to liquidate and monetize the
8 assets of the Estate, selling the Estate Claims is an appropriate course of action for the Trustee, or
9 the decision is subject to the deferential business standard. Instead, the Debtor effectively accuses
10 the Trustee of malfeasance by “favoring one creditor over the others, in order to pay her own fees
11 and expenses at the expense of the Estate” and alleging the sale of the Estate Claims “likely will not
12 accomplish more for the creditors of the Estate than paying the administrative expenses and
13 professional fees of the Trustee” and “other creditors of the estate will likely not be paid by the
14 funds generated from this sale meaning that the Estate does not benefit as a whole but instead the
15 Trustee and the Buyer are the only parties that will benefit from this sale.” Opposition at 6-7.

16 The Debtor’s aspersions against the Trustee and misrepresentations regarding the sale terms
17 are blatantly false. As set forth in the Motion and supporting record, there are only two creditors
18 that filed proofs of claim and may receive distributions from the Estate, including the Buyer. The
19 proceeds from the Purchase Price will be used by the Trustee to pay the only other allowed claim
20 held by American Express National Bank in full and then applied to the administrative expenses
21 and professional fees of the Estate. To facilitate the transaction, the Buyer further agreed that the
22 Purchase Price could exclusively be used by the Trustee for these purposes and waived any
23 distribution from the proceeds.

24 Although the Debtor references other scheduled claims (including implausible debts to his
25 wife/ex-wife/wife Chen exceeding \$45 million) and complains they “will likely not be paid by the
26 funds generated from this sale”, those purported creditors *never filed proofs of claim* and the time to
27 do so has long since passed. Consequently, to the extent the “other creditors of the estate will likely
28 not be paid by the funds generated from this sale,” it is because they do not have allowed claims

1 and are not ineligible to even receive distributions from the Estate. *See* Fed. R. Bankr. P. 3002(a);
2 11 U.S.C. § 726(a).

3 Under these circumstances, the sale of the Estate Claims will result in the only other allowed
4 claim against the Estate being *paid in full* while the Buyer receives none of the proceeds.
5 Importantly, in the absence of this arrangement the Buyer would recover more than 99.99% of the
6 proceeds derived from the Estate Claims given the magnitude of its allowed claim against the
7 Estate, while the holder of the other allowed claim would receive practically nothing. Thus, “from
8 the estate’s point of view” the proposed sale of the Estate Claims that will make funds available to
9 pay the only other allowed claim in full and relieve the Estate from the burdens, costs, and risks
10 inherent to litigation is a proper exercise of the Trustee’s business judgment and the Purchase Price
11 is fair and reasonable. Opposition at 8 (citing *In re Sunland, Inc.*, 507 B.R. 753 (2014)).

12 Moreover, the terms of the proposed sale to the Buyer are objectively “better or more
13 acceptable” than any illusory proposal the Debtor speculates Chen “appears to be willing” to make
14 for the Estate Claims. *Id.* As a starting point, Chen is the primary target of the Estate Claims, she
15 did not object to the Motion or make any offer to the Trustee, and there is no evidence or basis to
16 believe the Trustee is “faced with two bona fide offers” for the Estate Claims that actually exist. *Id.*
17 (citing *In re Scimeca Found., Inc.*, 497 B.R. 753 (Bankr. E.D. Pa. 2013)). Instead, the nominal
18 additional \$2,000 that Chen supposedly “appears to be willing” to pay for the Estate Claims
19 evidences that the Debtor and Chen are simply trying to obstruct the sale and pursuit of the Estate
20 Claims by the Buyer and avoid significantly greater potential liability. Stated differently, it is
21 apparent that the Debtor and Chen have no intent to make a “bona fide offer[]” to the Trustee for
22 the Estate Claims that approximates their actual exposure, and they are only making phony token
23 offers for the lowest amount possible in an effort to evade the risk that their fraudulently transferred
24 assets will ultimately be recovered.

25 Regardless, in addition to not constituting a “bona fide offer[]”, it also would not be “on
26 substantially similar terms” because there would be no consensual arrangement with the Buyer to
27 subordinate its \$21 million claim to the only other allowed claim against the Estate. *Id.* As a result,
28 rather than achieving a guaranteed recovery of 100% of its claim, at maximum the other creditor

1 might receive only .0004% of any remaining proceeds given the size of the Buyer's allowed and
2 undisputed claim against the Estate. Therefore, "from the estate's point of view" the sale of the
3 Estate Claims to the Buyer is both far "better [and] more acceptable" than the unsubstantiated and
4 equivocal proposal the Debtor thinks Chen "appears to be willing" to make for them. *Id.*

5 **C. The Buyer Should Be Granted Relief from the Automatic Stay**

6 The Debtor also has not shown that he has any pecuniary interest at stake if relief from the
7 automatic stay were granted to the Buyer to the extent necessary to pursue and collect the Estate
8 Claims. Indeed, since the Debtor claims to have no assets, has no interest in the Estate Claims, and
9 does not dispute the Buyer's allowed \$21 million claim, granting relief from stay to the Buyer for
10 these purposes would not appear to have any direct, adverse financial effect on the Debtor or
11 present any economic risk to him. However, in the event that the Court has any concern about the
12 potential scope of relief from stay relative to the Debtor, the Trustee can appropriately limit its
13 application to that extent in the order approving the Motion. Otherwise, the Debtor should not
14 impede or dictate the venue in which the Buyer elects to pursue the Estate Claims, in particular
15 against non-debtor third parties such as Chen.

16 **III. CONCLUSION**

17 For the foregoing reasons, the Trustee respectfully requests that the Court deny the Debtor's
18 objection and grant the Motion in its entirety.

19
20 DATED: April 29, 2025

Respectfully submitted,

DINSMORE & SHOHL LLP

23 By: /s/ Brian M. Metcalf
24 Peter J. Mastan
25 Brian M. Metcalf
26 Counsel to Amy L. Goldman,
27 Chapter 7 Trustee
28

DECLARATION OF BRIAN M. METCALF

I, Brian M. Metcalf, declare:

1. I am an attorney admitted to practice before this Court at Dinsmore & Shohl LLP, counsel to Amy L. Goldman, the Chapter 7 Trustee of the bankruptcy of Yao Lin in the above-captioned bankruptcy case. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Motion of Chapter 7 Trustee Amy L. Goldman for an Order (A) Approving Sale of Estate Claims Free and Clear of All Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. § 363(f), (B) Granting Protection to Buyer as a Good Faith Purchaser Pursuant to 11 U.S.C. § 363(m), (C) Waiving Stay Under Federal Rule of Bankruptcy Procedure 6004, and (D) Granting Relief From the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Docket No. 61] (the “Motion”).

2. Except as expressly stated otherwise, I have personal knowledge of the facts set forth below and could and would competently testify under oath thereto if requested to do so.

3. This declaration is being submitted in support of the *Reply to Debtor Yao Lin’s Opposition to Motion of Chapter 7 Trustee Amy L Goldman for an Order (A) Approving Sale of Estate Claims Free and Clear of All Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. 363(f), (B) Granting Protection to Buyer as a Good Faith Purchaser Pursuant to 11 U.S.C. § 363 (m), (C) Waiving Stay Under Federal Rule of Bankruptcy Procedure 6004, and (D) Granting Relief From the Automatic Stay* (the “Reply”).

4. The Court may take judicial notice of the following:

- (a) On May 9, 2023, the Debtor filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code and an accompanying summary of assets and liabilities, schedules, and statement of financial affairs (collectively, the “Petition”) [Docket No. 1].
- (b) The Debtor signed the Petition and related forms under penalty of perjury and stated that he had read them and the answers and information he provided were true and correct. *See* Petition at 6, 32.

- 1 (c) The summary of assets and liabilities filed by the Debtor indicate that he had
2 assets totaling \$2,816.29 and liabilities totaling \$91,500,072.97. *See* Petition
3 at 9.
- 4 (d) The schedules filed by the Debtor list an undisputed claim owed to Beijing
5 Soufun Science and Technology Development Co., Ltd. in the amount of
6 \$21,165,155.97. *See* Petition at 21.
- 7 (e) On June 12, 2023, the Debtor filed amended schedules that adjusted the total
8 value of his assets to \$128,192.77 [Docket No. 10].
- 9 (f) The Petition and schedules, as amended, reflect that the Debtor listed assets
10 valued at \$128,192.77 and liabilities that total \$91,500,072.97, thereby
11 indicating that the Debtor's scheduled liabilities exceed the value of his
12 scheduled assets by \$91,371,880.20.

13 5. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the Petition
14 and schedules showing the Debtor listed a claim owed to Beijing Soufun Science and Technology
15 Development Co., Ltd. in the amount of \$21,165,155.97 that is not contingent, unliquidated, or
16 disputed, and stated under penalty of perjury that the information was true and correct.

17
18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct. Executed this 29th day of April, 2025 in Santa Barbara, California.

20
21 /s/ Brian M. Metcalf
22 BRIAN M. METCALF
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EXHIBIT 1

Debtor 1 **Yao Lin**

Case number (if known)

4.2

Beijing SouFun Sci. & Tech. Dev. Co

Nonpriority Creditor's Name

c/o Marc Feinstein**400 S. Hope Street,
18th Floor****Los Angeles, CA 90071**

Number Street City State Zip Code

Who incurred the debt? Check one.☐ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☒ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

\$21,165,155.97

When was the debt incurred?

9/2017**As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts**Case No. 22STCV30434****Personal guarantor on business loan to****Allscore.**☒ Other. Specify

4.3

China Overseas Scholars Foundation

Nonpriority Creditor's Name

111 NanHeYan Street**DongCheng District****Beijing, China**

Number Street City State Zip Code

Who incurred the debt? Check one.☐ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☒ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

\$1,500,000.00

When was the debt incurred?

12/2018**As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify**Personal guarantor on business loan.**

4.4

Jia Chen

Nonpriority Creditor's Name

435 WOODBLUFF RD**Calabasas, CA 91302**

Number Street City State Zip Code

Who incurred the debt? Check one.☐ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☒ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

\$2,000,000.00

When was the debt incurred?

6/2020**As of the date you file, the claim is:** Check all that apply☒ Contingent☒ Unliquidated☒ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify**Personal loan for the benefit of Debtor's****company, Allscore.**

Fill in this information to identify your case:

Debtor 1 Yao Lin
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA

Case number
(if known) _____

☐ Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person _____ Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X Yao Lin
Signature of Debtor 1

Date May 29, 2023

X _____
Signature of Debtor 2

Date _____

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

550 S. Hope Street, Suite 1765
Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled **REPLY TO DEBTOR YAO LIN'S OPPOSITION TO MOTION OF CHAPTER 7 TRUSTEE AMY L. GOLDMAN FOR AN ORDER (A) APPROVING SALE OF ESTATE CLAIMS FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS PURSUANT TO 11 U.S.C. § 363 (f), (B) GRANTING PROTECTION TO BUYER AS A GOOD FAITH PURCHASER PURSUANT TO 11 U.S.C. § 363(m), (C) WAIVING STAY UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 6004, AND (D) GRANTING RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d); DECLARATION OF BRIAN M. METCALF IN SUPPORT THEREOF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 29, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **April 29, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* **April 29, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/29/2025

Katrice Ortiz

/s/ Katrice Ortiz

Date

Printed Name

Signature

In re Yao Lin
U.S.B.C. – San Fernando Division
Case No. 1:23-bk-10733-MB

I. SERVED ELECTRONICALLY VIA NEF:

- **Amy L Goldman (TR)** marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com
- **Clifford P Jung** curtis@jyllp.com, ry@jyllp.com;jessica@jyllp.com
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- **Brian M Metcalf** brian.metcalf@dinsmore.com, brian-metcalf-9774@ecf.pacerpro.com;katrice.ortiz@dinsmore.com
- **Jonathan Serrano** Jonathan@MarguliesFaithLaw.com, vicky@marguliesfaithlaw.com;angela@marguliesfaithlaw.com;amber@marguliesfaithlaw.com
- **United States Trustee (SV)** ustpreion16.wh.ecf@usdoj.gov

II. SERVED VIA REGULAR U.S. MAIL:

Debtor:

Yao Lin
435 Woodbluff Rd
Calabasas, CA 91302-2209

Jia Chen
Yao Lin
Trustee to Shinewoods Trust, Dated October 8, 2021
435 Woodbluff Rd
Calabasas, CA 91302-2209

Jia Chen
Yao Lin
Trustee to Shinewoods Trust, Dated October 8, 2021
31663 Broad Beach Rd.
Malibu, CA 90265

Jia Chen
435 Woodbluff Rd
Calabasas, CA 91302-2209

CREDITORS AND INTERESTED PARTIES

Employment Development Dept.
Bankruptcy Group MIC 92E
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Franchise Tax Board
Bankruptcy Section MS: A-340
P. O. Box 2952
Sacramento, CA 95812-2952

Industrial and Commercial
Bank of China (USA)
388 E Valley Blvd., Unit 18
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Beijing SouFun Sci. &
Tech. Dev. Co
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400 S. Hope Street, 18th Floor
Los Angeles, CA 90071-2801

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City of Los Angeles
200 N Spring St., RM 101 City Hall
Los Angeles, CA 90012-3224

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Heilongjiang, China

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III. SERVED VIA OVERNIGHT DELIVERY (FED EX):

United States Bankruptcy Court

Honorable Martin R. Barash
United States Bankruptcy Court – Central District of California
21041 Burbank Boulevard, Suite 342/Ctrm 303
Woodland hills, CA 91367